IN THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF ALABAMA NORTHERN DIVISION

IN RE:	
CHRISTA L. EVANS,)
XXX-XX-3717,)
) CASE NO. 21-81675
Debtor,)

MOTION FOR PERMISSION TO CONVERT TO CHAPTER 13 BANKRUPTCY

COMES NOW the Debtor, by and through her attorney, Jackie Ferguson Graham and files this her Motion For Permission To Convert To Chapter 13 Bankruptcy and shows unto this Honorable Court as follows:

- 1. The Debtor avers that this case was originally filed as a Chapter 7 bankruptcy in the United States Bankruptcy Court for the Northern District of Alabama, Northern Division on September 30, 2021.
- 2. The Debtor avers that at the time of the filing of her Chapter 7 bankruptcy that she owned a house and lot located at 118 Tres Drive Huntsville, Alabama valued at \$105,640.00 by the Madison County Tax Assessor. The Debtor owed \$86,332.06 on the house at the time of filing and claimed a real estate exemption of \$16,450.00. By the Debtor's calculation she had \$2,858.00 in equity in her property at the time of filing.
- 3. The Chapter 7 trustee's office has indicated that it thinks, based on an initial observation of a representative of Mickey Fowler's office that the house could auction for between \$120,000.00 and \$140,000.00. The Debtor does not think that this is possible.
- 4. The Debtor is a single parent, has young children and cannot lose her home. As such the Debtor wishes to convert to a Chapter 13 bankruptcy so that she may pay a her creditors based on the value of any non-exempt equity in her house and to keep her home.
- 5. The Debtor avers that she files this motion in good faith with no intent to defraud the Court or her creditors.

WHEREFORE, PREMISES CONSIDERED, the Debtor moves this Honorable Court to grant her motion to convert her Chapter 7 Bankruptcy to a Chapter 13 Bankruptcy.

Respectfully submitted,

/s/ Jackie Ferguson Graham
Jackie Ferguson Graham (FER014)
Attorney for Debtor
303 Williams Ave. SW #321
Huntsville, AL 35801
(256) 534-3435

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing upon the Chapter 13 Trustee and the attached Creditor mailing matrix by placing a copy of same in the United States Mail, properly addressed and postage pre-paid and/or by Electronic Transmission on this the 3rd day of February, 2022.

/s/ Jackie Ferguson Graham

Label Matrix for local noticing 1126-8 Case 21-81675-CRJ7 NORTHERN DISTRICT OF ALABAMA Decatur

Thu Feb 3 09:33:34 CST 2022
(p)DISCOVER FINANCIAL SERVICES LLC

PO BOX 3025

NEW ALBANY OH 43054-3025

Franklin Collection PO BOX 3910 Tupelo, MS 38803-3910

Huntsville Emergency Physicians c/o Frranklin Collection Services, Inc. P.O. Box 3910 Tupelo, MS 38803-3910

Pay Pal PO Box 965004 Orlando, FL 32896-5004

Christa L. Evans 118 Tres Drive Huntsville, AL 35811-8841

Tazewell Shepard, Trustee PO Box 19045 Huntsville, AL 35804-9045 U. S. Bankruptcy Court 400 Well Street P. O. Box 2775 Decatur, AL 35602-2775

Fortiva P.O. Box 105555 Atlanta, GA 30348-5555

Freedom Mortgage P.O. 619063 Dallas, TX 75261-9063

Kohl's PO BOX 2983 Milwaukee, WI 53201-2983

Target Card Services P.O. Box 660170 Dallas, TX 75266-0170

Jackie Ferguson Graham 303 Williams Ave SW, Ste 321 Huntsville, AL 35801-6001 Citibank Customer Seervice P.O. Box 6500 Sioux Falls, SD 57117-6500

Fowler Auction and Real Estate Svc Inc. Attn: Mickey Fowler 8710 Highway 53 Toney, AL 35773-9151

Green Sky Credit P.O. Box 29429 Atlanta, GA 30359-0429

Northeast Alabama Health Services 309 Taylor St. Midland, NC 28107

Ultament Rewards P.O. Box 183003 Columbus, OH 43218-3003

Richard M Blythe United States Bankruptcy Administrator PO Box 3045

Decatur, AL 35602-3045

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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Discover Financial Services End of Label Matrix
P.O. Box 30943 Mailable recipients
Salt Lake City, UT 84130-0943 Bypassed recipients
Total